

1 Pamela M. Egan, WSBA No. 54736 (*pro hac vice*)  
2 William R. Firth, III (admitted *pro hac vice*)  
3 CKR Law LLP  
4 506 2<sup>nd</sup> Avenue, 14<sup>th</sup> Floor  
5 Seattle, WA 98114  
6 Telephone: (415) 297-0132  
7 Facsimile: (206) 582-5001  
8 Email: [pegan@ckrlaw.com](mailto:pegan@ckrlaw.com)

5 *Attorneys for Mark D. Waldron, in his capacity as*  
6 *the duly-appointed Chapter 11 Trustee*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

10 || In re:

Case No. 18-03197

11 GIGA WATT, Inc., a Washington corporation,

# The Honorable Frederick P. Corbit

## Chapter 11

Debtor.

# **NOTICE OF MOTION OF CHAPTER 11 TRUSTEE FOR APPROVAL OF COMPROMISE WITH EXECUTIVE FLIGHT, INC.**

16       **PLEASE TAKE NOTICE** that Mark D. Waldron, in his capacity as the  
17       duly appointed Chapter 11 trustee (“Trustee”)<sup>1</sup> in the bankruptcy case of the  
18       above-captioned debtor (“Debtor”), has respectfully moved (“Motion”) this Court  
19       pursuant to 11 U.S.C. § 363 and Rule 9019 of the Federal Rules of Bankruptcy  
20       Procedure for entry of an Order authorizing the Trustee to enter into the

<sup>23</sup> <sup>1</sup> Unless otherwise defined herein, capitalized terms in this Notice have the meanings ascribed to them in the Motion.

1 Settlement Agreement with Executive Flight, Inc. ("EFI") as described in the  
2 Motion.

3 **PLEASE TAKE FURTHER NOTICE THAT** pursuant to the Settlement  
4 Agreement the estate will be released from a claim that asserts the right to  
5 payment on an administrative basis of \$12,378.18. In exchange, the estate will  
6 transfer to EFI certain office furniture with an estimated appraised value of  
7 \$4,530.

8 **PLEASE TAKE FURTHER NOTICE** that the Motion and its supporting  
9 papers and exhibits may be obtained from the Clerk of the above-captioned Court.

10 **PLEASE TAKE FURTHER NOTICE** that if you oppose the Motion,  
11 then **WITHIN TWENTY-FOUR DAY (24) DAYS FROM THE DATE OF**  
12 **SERVICE BY MAIL AS INDICATED BELOW**, you must file your written  
13 response with the Court Clerk, U.S. Bankruptcy Court, Eastern District of  
14 Washington, 904 West Riverside Ave., Suite 304, Spokane, WA 99201 or, if by  
15 mail, the Court Clerk, U.S. Bankruptcy Court, Eastern District of Washington, P.O.  
16 Box 2164, Spokane, WA 99210-2164 and serve a copy upon (1) undersigned  
17 counsel at CKR Law LLP, 506 Second Ave., 14th Floor, Seattle, WA 98114 and  
18 (2) James Perkins, Office of The United States Trustee, 920 West Riverside  
19 Avenue, Suite 593, Spokane, WA 99201-1012.

20 **PLEASE TAKE FURTHER NOTICE** that the Court may enter an order  
21 without an actual hearing or further notice unless a written objection is timely  
22  
23

1 served and filed. If an objection is timely served and filed, you will receive notice  
2 of the date and time of a hearing on your objection.

3 **DATE OF SERVICE BY MAIL: APRIL 24, 2019**

4

5 Dated: April 23, 2019 CKR LAW LLP

6

7

*/s/ Pamela M. Egan*

8

Pamela M. Egan  
William R. Firth, III

9

*Attorneys for Mark D. Waldron, in his capacity  
as the duly-appointed Chapter 11 Trustee*

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

---

Notice of Chapter 11 Trustee's Motion for  
Approval of Compromise With Executive Flight, Inc. - Page 3

25